



**Fact Sheet on the
Amendment and Extension of
Environmental Cooperative Agreement
between
Cook Composites and Polymers Co and
Wisconsin Department of Natural Resources**



Following a public comment period, the Wisconsin Department of Natural Resources (WDNR) will determine whether or not to amend and extend the Environmental Cooperative Agreement (Agreement) that it signed with Cook Composites and Polymers Company on October 1, 2001. Both the original Agreement and the proposed amendment and extension were developed under Wisconsin's Environmental Cooperation Pilot Program pursuant to Section 299.80, Wis. Statutes. Information on where to get more information and how to comment on this agreement is found at the end of this factsheet.

A. Background

1. The Facility

The CCP Saukville facility manufactures polyester and alkyd resins used in a variety of applications including coatings, sanitary, building materials, automotive, infrastructure, and marine industries. The facility, located about 25 miles north of Milwaukee, began resin production in 1949 and employs approximately 60 full-time employees.

CCP acquired the Saukville facility and other assets in 1990 from Freeman Chemical Corporation. CCP is a Joint Venture of TOTAL Composites Inc., a subsidiary of the global energy company TOTAL based in France, and Curran Composites Inc. of Kansas City, MO. CCP is headquartered in Kansas City, MO and operates with its sister company CRAY VALLEY within the Resins Division of the TOTAL Chemical Branch.

The CCP Saukville facility now produces about 60 million pounds of resin per year. Over the past 5 years, this facility has greatly increased its production of water-based dispersions, which now account for almost half of its total production. The primary wastes generated at the facility are: polyester by-product reaction water; spent azeotrope xylene by-product; spent xylene solvent rinses; spent glycol scrubber solution and rinses; resin filtration media and residue; and miscellaneous off-specification resin and polymer materials. The facility routinely provides information on its emissions, discharges and waste generation for its incinerator and other operations to WDNR under the separate reporting and permitting requirements of Wisconsin's Hazardous Waste, Air, Water and other environmental laws

2. The Original Agreement

The initial Environmental Cooperative Agreement between Cook Composites and Polymers Co. (CCP) and Wisconsin Department of Natural Resources (WDNR), signed in 2001, focused on evaluating the feasibility and desirability of a project to eliminate five million pounds of a characteristically hazardous wastewater and the need for a hazardous waste incinerator. Specifically, CCP committed to cease burning hazardous waste in its incinerator; establish an environmental management system (EMS); and seek other opportunities for waste minimization, pollution prevention, product stewardship and other environmental benefits at CCP's Saukville, Wisconsin facility in cooperation with its neighbors, customers, local community, and WDNR.

3. Results from the Original Agreement

During the five years of the initial agreement,

- CCP created a stakeholder process built on open dialogue and trust. They have worked with the community to develop a complaint feed-back system that is helping them respond rapidly to odor and noise complaints and make cost-effective investments to eliminate root causes.
- CCP removed certain toxic constituents from its waste so that it no longer burns hazardous waste in its incinerator, and eliminated the need to have a costly RCRA Hazardous Waste TSD license.
- CCP employees reduced solvents used for cleaning kettles from 1.7 million pounds a year to less than 1.2 million pounds a year.
- CCP introduced new product lines of low VOC coatings and polymers, including water based alkyd resins that help their customers reduce emissions and meet Clean Air requirements.

B. Amendment and Extension of the Agreement

Based on the successful implementation of the 2001 Agreement, CCP and WDNR are proposing to renew the Agreement for another five years, as allowed in the enabling legislation. As part of this renewed agreement, CCP recommits to continual improvement efforts using its integrated management system. CCP will continue to focus on waste minimization, pollution prevention, noise and odor prevention, product stewardship, as well as other environmental and sustainability improvements. CCP also commits to engage industrial and commercial neighbors, customers, the Village of Saukville and Ozaukee County to help encourage local, regional and state environmental improvements. DNR will assist CCP in establishing new relationships and engaging state and regional partners to foster market-based and community-based opportunities for CCP to generate these improvements.

CCP will continue to develop innovative products for composites and polymers product offerings that, as replacements to prior technology, benefit the environment to a degree far greater than may be achieved through its operational controls at its facility. CCP will refer to this initiative as its Design-for-Environment (DfE) process and will use established U.S. Environmental Protection Agency (EPA) and other recognized guidance in developing its program.

CCP is going beyond what would otherwise be required in environmental regulations by setting a comprehensive set of goals for the renewed Agreement. Both CCP and DNR recognize that some of these are “stretch” goals—they may not be easily attainable but are worthy of a strong effort to achieve them. Priorities for each year will be developed jointly among CCP, DNR and the Community Advisory Committee. CCP and DNR will report on progress annually.

Following are the three jointly developed visions for the proposed amended Agreement. More detailed goals are specified in the amended Agreement.

Vision Element 1. Utilizing the framework of its integrated management system, CCP Saukville, reduces its environmental footprint, achieves continual improvement toward operations excellence, superior environmental performance, and sustainability.

1.1 CCP continues to explore and implement onsite opportunities for waste minimization, pollution prevention, reducing energy use and greenhouse gases, noise and odor prevention, and other environmental and sustainability improvements. CCP continues long-term reductions in the amount of wastes generated and contaminants and pollutants released giving priority to those pollutants, contaminants and waste of highest health and environmental concern and preventing undesirable transfer of chemical releases from one media (air, water, land) to another.

1.2 CCP continues an effective dialogue with its neighbors and the Saukville community at large, resulting in better business, environmental and societal decisions by CCP, community enhancement, and mutual trust.

1.3 WDNR and CCP will participate in a joint environmental management system review process for work planning and regular communication and use the process to work out the details necessary to implement this agreement, oversee the agreed upon activities, measure continuous improvement and report on progress.

Vision Element 2. CCP, WDNR and others collaborate to foster sustainable communities in Saukville, Ozaukee County, southeastern Wisconsin and the entire state by creating environmental improvements that also result in business and governmental efficiencies.

2.1 CCP and WDNR work together and with the Community Advisory Committee to create local and regional partnerships to increase energy efficiency, reduce emissions of greenhouse gases, reduce water use, enhance storm water management, and create other environmental or natural resource improvements

2.2 WDNR leverages assistance from and collaborates with, other State and Federal agencies or national organizations with appropriate expertise, resources and/or common interests.

Vision Element 3. Together, CCP and WDNR drive market-based environmental solutions and improvement.

3.1 CCP takes a leadership role in product design and stewardship, by integrating health, safety and environmental considerations into the design, development, improvement and marketing of its products. This includes a commitment to conserve, where possible natural resources and energy. In partnership with its customers CCP strives to encourage continued environmental stewardship in the use and ultimate disposal of its products.

3.2 WDNR facilitates connections among industry sector partnerships, Green Tier and other progressive companies with common product and environmental interests, and targeted WDNR, EPA and university programs to enhance environmental stewardship and market development options for CCP products and applications.

3.3 WDNR and CCP apply the experiences of the Environmental Cooperation Pilot Program, Green Tier, Air Permit Streamlining Project and other innovation projects to speed the process of implementing modifications that support innovation and superior environmental performance relating to CCP's operations and products.

Key Efforts Will Continue as Before

Important environmental protection safeguards and community involvement efforts will continue as before under the renewed agreement.

- CCP will implement corrective action measures and monitoring relating to groundwater contamination at our site.
- As long as CCP continues to use its wastewater incinerator, we will monitor flash point and pH to ensure that no hazardous wastes are incinerated.
- CCP will maintain community information exchange and dialogue relating to all aspects of our environmental activities.

This Environmental Cooperative Agreement provides the structural framework for CCP and WDNR to prioritize and focus specified resources. No variances to existing regulations are anticipated to complete the objectives in this agreement. However, CCP shall rely upon the operational flexibility available under the Statute and commitment to deadlines by WDNR and US EPA to enable its continued growth and rapid technical evolution of production of its water-borne polymer dispersion product lines.

As part of this agreement WDNR and CCP will explore the option of creating a facility-wide air pollution control construction and operating permit for CCP Saukville that contains environmental management commitments beyond those ordinarily required by WDNR rules and operational flexibility for the manufacturing facility. If WDNR and CCP decide to develop a facility-wide air construction and operating permit for CCP, the public will have opportunity for input through normal air permit modification and/or environmental cooperative agreement amendment procedures

C. For More Information

To get a copy of the proposed amended Agreement:

- Visit DNR's website:
<http://dnr.wi.gov/org/caer/cea/ecpp/>. Click on "Agreements", and then click on the link for Cook Composites and Polymers Co.
- Contact Lynn Persson, DNR, 608/267-3763,
Lynn.Persson@dnr.state.wi
- Contact Glenn Preisler, CCP, 262/268-3395
preisler@ccponline.com)
- Visit the Oscar Grady Library in Saukville.

Public Informational Meeting

Wed. August 16, 2006

6:30 pm

**Village of Saukville's Municipal Center,
Community Room,
639 E. Green Bay Ave., Saukville, WI**

WDNR and CCP staff will provide information and answer questions and comments on the proposed amendment and extension to the Agreement.

D. Opportunity for public to comment

There is a 30-day public comment period for the public to provide written comments to the WDNR about the proposed amendment and extension to the Environmental Cooperative Agreement. This comment period ends August 25, 2006. Submit comments to Lynn Persson, WDNR CO/7, PO Box 7921, Madison, WI 53707-7921 or email Lynn.Persson@dnr.state.wi.us or fax 608/267-9305.